



U.S. Department of Justice  
**United States Attorney's Office**  
Eastern District of Virginia

Jessica D. Aber  
United States Attorney

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December 12, 2022

Yancey Ellis, Esq.  
Drewry Hutcheson, Esq.  
Lana Manitta, Esq.  
Harry Dennis, III, Esq.  
*Via E-mail*

**Re: United States v. Mullins et. al., 1:22-CR-120**

Dear Counsel:

On December 5, 2022, the Court ordered that “the government advise each defendant in writing of the particular provisions of chapter 110 and chapter 117 of Title 18 of the U.S. Code listed in the indictment that he is alleged to have violated.” Dkt. No. 69 at 2-3.

Accordingly, the United States provides the following written notice as to which provisions of Chapter 110 and Chapter 117 each of the defendants in the above-captioned matter is alleged to have violated as part of the child exploitation enterprise conduct:

**Jacob Royce Mullins:**

- 18 U.S.C. § 2251(a) and (e) – Production, Attempted Production, and Conspiracy to Produce Child Pornography
- 18 U.S.C. § 2252(a)(2) and (b)(1) – Distribution, Attempted Distribution, and Conspiracy to Distribute Child Pornography
- 18 U.S.C. § 2252(a)(2) – Receipt, Attempted Receipt, and Conspiracy to Receive Child Pornography
- 18 U.S.C. § 2252(a)(1) and (b)(1) – Transportation, Attempted Transportation, and Conspiracy to Transport Child Pornography
- 18 U.S.C. § 2422(b) – Coercion and Enticement, Attempted Coercion and Enticement

**Kyle William Leishear:**

- 18 U.S.C. § 2251(a) and (e) – Production, Attempted Production, and Conspiracy to Produce Child Pornography
- 18 U.S.C. § 2252(a)(2) and (b)(1) – Distribution, Attempted Distribution, and Conspiracy to Distribute Child Pornography
- 18 U.S.C. § 2252(a)(2) – Receipt, Attempted Receipt, and Conspiracy to Receive Child Pornography

- 18 U.S.C. § 2252(a)(1) and (b)(1) – Transportation, Attempted Transportation, and Conspiracy to Transport Child Pornography
- 18 U.S.C. § 2422(b) – Coercion and Enticement, Attempted Coercion and Enticement
- 18 U.S.C. § 2423(b) and (e) – Travel with Intent to Engage in Illicit Sexual Conduct, and Attempted Travel to Engage in Illicit Sexual Conduct

**William Christopher Kuehner**

- 18 U.S.C. § 2251(a) and (e) – Production, Attempted Production, and Conspiracy to Produce Child Pornography
- 18 U.S.C. § 2252(a)(2) – Receipt, Attempted Receipt, and Conspiracy to Receive Child Pornography
- 18 U.S.C. § 2252(a)(1) and (b)(1) – Transportation, Attempted Transportation, and Conspiracy to Transport Child Pornography
- 18 U.S.C. § 2422(b) – Coercion and Enticement, Attempted Coercion and Enticement

**Matthew Martin**

- 18 U.S.C. § 2252(a)(2) and (b)(1) – Distribution, Attempted Distribution, and Conspiracy to Distribute Child Pornography
- 18 U.S.C. § 2251(a) and (e) – Production and Attempted Production of Child Pornography
- 18 U.S.C. § 2252(a)(2) and (b)(1) – Attempted Receipt of Child Pornography

Sincerely,

Jessica D. Aber  
United States Attorney

By: \_\_\_\_\_/s\_\_\_\_\_  
Whitney Kramer  
Special Assistant United States Attorney (LT)  
Seth Schlessinger  
Assistant United States Attorney

Enclosure(s):

cc: